

I am commenting on a proposed LPAM (Low Power AM) radio service.

My suggestions are:

instead of only 30-watts and 100-watts, allow stations to use other power levels in between those, and below if desired.

Do not require 3rd-adjacent-channel protection for 100-watt stations, or 2nd-adjacent-channel protection for 25-watt (or 30-watt) stations.

Also for example allow 10-watt stations with the same antenna limit as TIS stations.

Permit full NRSC-compliant 10-KHz audio bandwidth, and strongly recommend stereo but do not require it. (I'd love to say "require it" but many people and/or groups that would like to be able to set up an LPAM station may not be able to afford to broadcast in stereo.) Also prohibit IBOC for LPAM stations, maybe.

Also a suggestion for part 15: raise the power and antenna limits for AM 510KHz to 1705KHz to the same as for 160-190 KHz, namely 1 watt power limit and 15 meter antenna limit (also specify that ground radial system is not included in the limitation).

Also expand the band slightly so it encompasses 510KHz to 1720KHz. Reserve 1710KHz for TIS stations and Part 15 stations.

do not require stations to have a maximum broadcast time, rather allow 24/7 broadcasting, and if stations wish to shut their transmitter off or reduce power at certain times make it their choice, unless they specifically apply for reduced power / off air at night to protect a larger full-power station (or are required to do so).

For very low power (for example 2.5- to 10-watt) LPAM stations, set up mileage separations in such a way so that co-channel stations can be set up in the eastern part of Dallas, TX, and western part of Ft Worth, TX, for example, or at opposite edges of New York City, NY, or in Los Angeles, CA, and San Bernardino, CA, for example.

allow higher power levels than 100 watts in rural areas, for example up to 150 to 200 watts in some places like western TX, northeast county San Diego, CA (Borrego Springs, Julian, etc.).

For those who wish to build the station in their own back yard, and have sufficient real estate, allow direction antenna systems to be used for people who live at or near the edge of the area they want to cover, for example.

On the "graveyard" channels (1230, 1240, 1340, 1400, 1450, 1490), reduce the mileage separations considerably, and allow higher power, for example up to 250 watts, daytime.

Set the filing fees for construction permits / licenses, in such a way that college students paying their own way through college, and working part time at minimum wage would be able to easily afford to set up a LPAM stereo station.

Greatly reduce, or eliminate, the fees for broadcasting music, for 25-watt and lower power stations.

